

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LYNNE FREEMAN, an individual,

Plaintiff,

-against-

Case No. 1:22-cv-2435

TRACY DEEBE-ELKENANEY P/K/A TRACY
WOLFF, an individual, EMILY SYLVAN KIM, an
individual, PROSPECT AGENCY, LLC, a New
Jersey limited liability company, ENTANGLED
PUBLISHING, LLC, a Delaware limited liability
company, MACMILLAN PUBLISHERS, LLC, a
New York limited liability company, UNIVERSAL
CITY STUDIOS, LLC, a Delaware limited liability
company

**AFFIDAVIT IN SUPPORT
OF MOTION TO ADMIT
COUNSEL
*PRO HAC VICE***

Defendants.


-----X

I, Mark D. Passin, being duly sworn, hereby depose and say as follows:

1. I am an attorney licensed to practice law in the state of California and am "of counsel" to the law firm of CSReeder, PC.
2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above-captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the bar of the state of California.
4. There are no pending disciplinary proceedings against me in any state or federal court.
5. I have not been convicted of a felony.
6. I have not been censured, suspended, disbarred or denied admission or readmission by any court.
7. My Attorney Registration number is 101195.

8. Wherefore, your affiant respectfully submits that he be permitted to appear as counsel and advocate *pro hac vice* in the above-captioned matter for Plaintiff, Lynne Freeman.

Executed on this 23 day of March 2022



Mark D. Passin, Esq.
CSReeder, PC
11766 Wilshire Boulevard, Suite
1470
Los Angeles, CA 90025
(310) 861-2475
mark@csrlawyers.com

Sworn to me this
23 day of March, 2022

PLEASE SEE CALIFORNIA
Notary **NOTARY CERTIFICATE**



**The State Bar
of California**

180 Howard Street, San Francisco, CA 94105

**OFFICE OF ATTORNEY REGULATION &
CONSUMER RESOURCES**

AttorneyRegulation@calbar.ca.gov
888-800-3400

CERTIFICATE OF STANDING

March 14, 2022

TO WHOM IT MAY CONCERN;

This is to certify that according to the records of the State Bar, MARK D. PASSIN, #101195 was admitted to the practice of law in this state by the Supreme Court of California on December 1, 1981 and has been since that date, and is at date hereof, an ACTIVE licensee of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Alex Calderon", is written over a faint circular stamp.

Alex Calderon
Custodian of Records

CALIFORNIA JURAT WITH AFFIANT STATEMENT

GOVERNMENT CODE § 8202

- ☒ See Attached Document (Notary to cross out lines 1–6 below)
☐ See Statement Below (Lines 1–6 to be completed only by document signer[s], *not* Notary)

1
2
3
4
5
6

Signature of Document Signer No. 1 *Signature of Document Signer No. 2 (if any)*

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

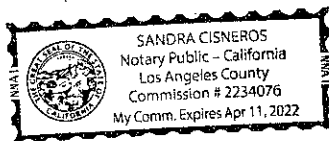
State of California
County of Los Angeles

Subscribed and sworn to (or affirmed) before me
on this 23rd day of March, 2022,
by Mark D. Passin
Date Month Year

(1) Mark D. Passin

(and (2) _____),
Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence
to be the person(s) who appeared before me.



Signature [Signature]
Signature of Notary Public

Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document Affidavit in Support of Motion

Title or Type of Document: to Admit Counsel Document Date: 3/23/2022

Number of Pages: 3 Signer(s) Other Than Named Above: _____